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WATER RIGHTS
SALT LAKE

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Mr. David B. Hartvigsen
Nielsen & Senior
60 East Temple, Suite 1100
Salt Lake City, Utah 84111

May 14, 1999

Re: Comments Pertaining to the "Draft - Salt Lake Valley Groundwater Management Plan"

Dear Mr. Hartvigsen:

We have reviewed the Draft Salt Lake Valley Groundwater Management Plan for the Magna Water Company and have the following comments for your review and consideration. In a global view of the plan, we agree with the stated goal that is to "allow for maximum utilization of the groundwater resource within the constraint of protecting the groundwater resources of Salt Lake Valley."

Based on our review of the Draft Plan, we offer the following observations, concerns, and comments that are specifically directed at issues which affect Magna:

- A. The Division of Water Rights (the Division) has attempted to over simplify the Draft Plan by creating only two regions, the Eastern Region and the Western Region. This simplification does not take into consideration differing hydrogeologic conditions that may exist within these regions. According to the Draft Plan, "change applications in the Western Region which propose to transfer water rights into a management square (4-square mile area) that the potential withdrawals under the existing water rights would exceed 2,000 af/yr will not be approved." Some areas, such as the Magna area, may have the potential to yield significantly higher annual volumes than the stipulated 2000 ac-ft/year. The Magna area has two major water users (Magna and Kennecott) that have historically not experienced interference problems despite year round withdrawals, which raises the question as to whether there may undeveloped groundwater in this area. We would recommend that the Division consider the development of additional regions or subregions that will more adequately address local hydrogeologic conditions, and that will better "allow for maximum utilization of the groundwater resources" within the Salt Lake Valley. Based on the studies cited in the Draft Plan, it would appear that the Division has the tools available to allow this refinement to the Draft Plan.